

REMARKS

Claims 1-85 are currently pending. Applicants respectfully request reconsideration of the above-identified application in light of the following remarks.

Claim Rejections under 35 U.S.C. §102

Claim 1-85 have been rejected as allegedly being anticipated by Broulik, et al. (US Patent No. 6,323,881)(Broulik). Applicants respectfully submit that independent claim 1 is patentably distinct from the cited reference.

Independent claim 1 recites, *inter alia*:

A method of creating an interface in a contextualized interaction environment...comprising... [an] interface represented in the contextualized interaction environment by a node map...[and] displaying the interface in accordance with the updated internal node map.

Applicants respectfully submit that Broulik does not disclose, teach or suggest the elements, as recited in independent claim 1.

Broulik is directed to a web based Graphical User Interface (GUI) server and method for a telecommunications node. Broulik's system facilitates maintaining a GUI interface via interactions between a user(client), a GUI browser situated on a personal computer, and a server, an HTTP Server hosted on a telecom node. More specifically, a user manipulates a GUI embedded in browser 40 hosted on a PC. The browser 40 creates a request (action for a change of the GUI display) and transmits the request to the telecom node 22. In telecom node 22, session manager 42 manages CGI tasks 44 46, 48 and 50, which act to receive and process the browser request sent from Browser 40 within telecom node 22. (See, Broulik, Col. 7, lines 5-54 for a more-detailed discussion of session manager/CGI task interaction).

However, Broulik's system does not disclose a system using the terms "context" and "node map" in the manner that would anticipate or is consistent with the terms in the instant application's independent claim 1. More specifically, Applicants submit that the Broulik's system does not anticipate the elements recited in independent claim, as they are used and discussed throughout the instant application's specification.

By way of example only, the specification discusses the terms "context" and "nodes" with regard to the invention as a contextualized interaction environment (CIE), wherein "the CIE allows the user to create a fully personalised map of his everyday life contexts, and to link all the information he needs to manage his everyday life to the nodes (i.e. contexts) of that map." (See, specification, page 4, lines 12-15) (emphasis added). Further, Fig. 5 is an exemplary illustration of a node map with a plurality of nodes 500, in accordance with an embodiment of the invention. The specification on page 20, line 20-page 21, line 6, describes the terms "node map," "context" and "CIE" elements with regard to Fig. 5 as:

A node map may be organized as a net structure 510 or in a hierarchical structure 520 as a tree. The node 500 is the core element of the CIE. The personalized CIE is based on the interlinked nodes 500. Each node 500 is given a name by the creator.

Each node may have a profile 530. The purpose of the profile 530 varies depending on the node-type. In accordance with one embodiment, in the hierarchical structure 520, a node 500 can inherit the profile of its parent node 500. The profile 530 consists of attributes and values. The collection of attributes is called a context. In the CIE, each node is a context, whose name is the name of the node 500. Moreover, each node 500 may have a profile 530 that specifies the values of the attributes of the context.

Accordingly, Applicants submit that the terms "contextualized interaction environment" and "node map" as recited independent claim 1 are patentably distinct from the use of the terms "context" and "node" in Broulik's disclosure. Broulik discloses a "[c]ontext

sensitivity means, that any time the user interacts with the telecommunications node 22, he/she can operate and get information only on the current configuration of the node 22.” (See, Broulik, Col. 5, lines 59-62). Further, Broulik provides the following example, “if a [hardware] card is removed from the node 22, [the craft user interface] CUI immediately recognized the change and does not allow any operation on the missing card.” (See, Broulik, Col. 5, lines 64-66). As in the quoted language, Broulik’s use of the term “context” is directed to providing a snap-shot of the current system configuration at a given moment in time, whereas Broulik’s use of the term “node” simply details a hardware element, specifically telecommunications node 22.

In summary, Applicants submit that the Broulik does not disclose, teach or suggest an interface “represented in the contextualized interaction environment by a node map” or “displaying the interface in accordance with the updated internal node map” as recited in independent claim 1 and discussed in the specification.

Furthermore, Independent claim 82 recites, “An apparatus for providing a user interface comprising elements that represent at least one context....” Applicants submit that the term “context” as recited in the independent claim 82 and used throughout the specification is patentably distinct from Broulik’s “context sensitivity,” for at least reasons similar to those discussed above.

Accordingly, Applicants submit that independent claims 1 and 82 are patentably distinct from Broulik’s system for at least the reasons discussed above. Moreover, Applicants submit that independent claims 27, 53, and 79, as well as the claims directly or indirectly dependent on claims 1, 27, 53 79 and 82 respectively, are also patentably distinct from the Broulik patent, for at least similar reasons. Therefore, Applicants request withdrawal of these grounds of rejection.

CONCLUSION

For at least the foregoing reasons, Applicants respectfully submit that all claims, as currently presented, are patentable, and that this application is in condition for allowance.

Respectfully submitted,
MORGAN & FINNEGAN, L.L.P.

Dated: November 15, 2004



Daniel C. Sheridan
Registration No. 53,585

Correspondence Address:

MORGAN & FINNEGAN, L.L.P.
3 World Financial Center
New York, NY 10281-2101
(212) 415-8700 Telephone
(212) 415-8701 Facsimile